

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 04-10060-RCL
)	
GEORGE SCHUSSEL,)	
Defendant)	

**DEFENDANT GEORGE SCHUSSEL'S ASSENTED-TO MOTION TO EXTEND TIME
FOR THE FILING OF PRETRIAL MOTIONS**

Now comes the defendant George Schussel in the above-captioned case and respectfully moves that this Honorable Court extend the date for the filing of his pretrial motions from the now-scheduled date of January 14, 2005, until January 18, 2005.

As reason therefor, defendant states:

1. Defendant's pretrial motions in this case are scheduled to be filed on January 14, 2005; also due on the same date is defendant's reply to the government's opposition to his Motion to Suppress Government's Use And Acquisition of Privileged Materials.

2. Defendant will file his reply to the government's opposition to his motion to suppress as scheduled on January 14, 2005. However, due to the complexity of the attorney-client privilege and work-product privilege issues presented in that motion and involved in the preparation of defendant's reply to the government's opposition, and the concomitant time necessary to prepare the reply, counsel needs additional time to prepare and file the remaining motions which defendant intends to file.

3. Defendant therefore requests that the Court extend the time for the filing of the remaining motions until January 18, 2005, which would allow counsel the three-day weekend to complete the

preparation of the remaining motions.

4. AUSA Carmen Ortiz assents to the granting of this motion.

Respectfully submitted,
By his attorney:

/s/ Martin G. Weinberg
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DATE: January 10, 2005